

OFFICE OF THE CHAPTER 13 STANDING TRUSTEE

ISABEL C. BALBOA

Chapter 13 Standing Trustee
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April 13, 2011

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The Honorable Judith H. Wizmur, Chief Judge
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

RE: Chapter 13 Bankruptcy Case No. 09-30971 (JHW)
Debtor(s) Name: Destiny R. Ferrelli

Dear Chief Judge Wizmur:

Please accept this letter as a limited objection to Debtor's Motion to Reinstate Case.

Debtor's case was filed on August 11, 2009. Debtor's case was confirmed October 14, 2009, at \$427.00 per month for forty-eight (48) months. Debtor's case was dismissed on March 3, 2011, for failure to submit plan payments to the Trustee.

Debtor now comes before the Court with a Motion to Reopen and Reinstate Case twenty (20) months after her Bankruptcy Petition was filed. Debtor has not submitted a plan payment to the Trustee since August 6, 2011, and by the return date of Debtor's motion, Debtor will be \$4,750.00 in plan arrears. Debtor has submitted five (5) out of twenty (20) payments since the filing of her Chapter 13 Petition. Debtor proposes to submit payment of \$1,000.00 by the reinstatement hearing.

While the Trustee does not oppose reinstatement of Debtor's case, the Trustee respectfully requests Debtor submit an amended proposed form of Order to the Judge's Chambers under the Seven-Day Rule to include the following language:

1. Debtor's case can continue at \$2,935.00 paid to date, \$1,000.00 within ten (10) days, then \$614.00 per month for twenty-seven (27) months, with a wage order starting June 1, 2011.

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully submitted,

/s/ Jane L. McDonald
Jane L. McDonald
Counsel

JLM:jpr

cc: Ronald E. Norman, Esquire (Via CM/ECF)
Destiny R. Ferrelli (Via Regular Mail)